REMARKS/ARGUMENTS

Applicants thank the Examiner for his careful review of this application. In the specification, the paragraph beginning at page 16, line 20 has been amended to correct a minor typographical mistake. No new matter has been added. Claims 1-20 have been rejected. Applicants respectfully request reconsideration of the application in view of the following remarks submitted in support thereof.

Rejections under 35 U.S.C. §103(a):

Claims 1-20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,463,498 to Wakeley et al. in view of U.S. Patent No. 5,954,796 to McCarty et al. As will be fully explained below, the combination of Wakeley et al. in view of McCarty et al. does not raise a *prima facie* case of obviousness against independent claims 1, 8, and 14.

Independent claims 1, 8, and 14 define a method, a system, and a computer program for providing device information using a Fibre Channel network. In particular, the independent claims define an address database that facilitates translation of operating system (OS) independent commands received by a Fibre Channel wrapper module into Fibre Channel commands usable by a Fibre Channel layer module that is in communication with a Fibre Channel controller.

In support of the 35 U.S.C. §103(a) rejection, the Examiner noted that McCarty et al. disclose communication "between FC environment and OS-compatible communication interface to facilitates [sic] dynamic address changing of the FC devices which changing is transparent to the OS-compatible upper-level software structures" (see Final Office Action mailed August 5, 2003 at page 3). Applicants respectfully traverse the Examiner's characterization in this regard because the portion of the reference relied upon by the

Examiner (col. 4, lines 7-21) does not teach translating OS independent commands received by the Fibre Channel wrapper module into Fibre Channel commands usable by a Fibre Channel layer module. Specifically, as disclosed in col. 4, lines 11-15:

> [I]t should be understood that most Operating Systems ... are not provided with the capability of communicating 'directly' with the devices disposed in the FC environment 220. Therefore, in order to operably include and harness the benefits of the FC environment 220 in an exemplary computer system 200, a link path 225 is provided between the FC environment 220 and the OS-compatible communication interface 215.

The above portion relied upon by the Examiner simply discloses a link path between the FC environment and the OS-compatible communication interface only. As a result, McCarty et al. only disclose a link path that translates OS dependent commands from the Operating System into OS independent commands to the FC environment. In contrast, independent claims 1, 8, and 14 define an additional layer of translation by the Fibre Channel wrapper module for translating the OS independent commands into Fibre Channel commands that are also OS independent commands.

Moreover, McCarty et al. disclose that a "FC-specific information is associated with an OS-compatible link element" (col. 9, lines 31-32). As illustrated in Figure 2 and Figure 5, the OS-compatible link element is encompassed and executed within an OS environment 250, wherein "the exemplary OS 210 and the OS-compatible interface/protocol 215 together constitute what will be henceforth referred to as an OS environment 250 in the computer system 200" (col. 3, lines 65-67). As disclosed in col. 8, lines 41-45:

> [A]n FC-specific LOG Function information structure 530 is uniquely mapped, via association means 599, to a link element that is interpretable by a higher-level OS-compatible interface standard.

In other words, McCarty et al. describe that the "OS would use the link element 525 in conjunction with association means 599 to send upper-level commands to the FC devices," whereby the FC devices are encompassed in a FC environment 220 (Figure 5 and col. 8, lines 61-63). As a result, McCarty et al. disclose a method to automatically change the dynamic loop address whereby the association means translates an OS dependent address into an OS independent address usable by the FC devices. There is simply no point in McCarty et al. to further translate the OS independent address because it is already usable by the FC devices. Since the reference relied upon by the Examiner discloses only one layer of translation, McCarty et al. cannot reasonably be considered to disclose or suggest to one having ordinary skill in the art the additional layer of translation by the Fibre Channel wrapper module, as defined in independent claims 1, 8, and 14.

To establish a *prima facie* case of obviousness, the prior art references must teach or suggest all the claim limitations (see MPEP2143). Here, in view of the incorrect characterization of McCarty et al., the references as combined do not teach all the features of the claimed invention. As such, the combination of Wakeley et al. in view of McCarty et al. does not raise a prima facie case of obviousness against independent claims 1, 8, and 14.

Additionally, to establish a prima facie case of obviousness based on a combination of references, there must be some suggestion or motivation, either in the references or in the knowledge generally available to one having ordinary skill in the art, to combine the references in the manner proposed. Here, the teachings of Wakeley et al. focus on a method and system that efficiently executes read commands for client/server mass storage solutions. In contrast, the teachings of McCarty et al. focus on dynamically changing a configuration of devices without a system reset. Executing read commands and dynamically changing the configuration of devices involve entirely different technologies and applications. As the

teachings of Wakeley et al. have nothing to do with the problems associated with changing the configuration of devices addressed by McCarty et al., Applicants submit that there would not have been any motivation for one having the ordinary skill in the art to combine Wakeley et al. and McCarty et al. in the manner proposed by the Examiner.

Accordingly, for the above-stated reasons, Applicants submit that independent claims 1, 8, and 14 are patentable under 35 U.S.C. §103(a) over Wakeley et al. in view of McCarty et al. Since dependent claims 2-7, 9-13, and 15-20 directly or indirectly depend from independent claims 1 8, and, 14, Applicants submit that the dependent claims are patentable under 35 U.S.C. §103(a) for the reasons set forth above. As a result, Applicants respectfully request the Examiner to withdraw the 35 U.S.C. §103(a) rejection for claims 1-20.

Conclusion

In view of the foregoing, the Applicants respectfully submit that all the pending claims 1-20 are in condition for allowance. Accordingly, a Notice of Allowance is respectfully requested. If the Examiner has any questions concerning the present Amendment, the Examiner is requested to contact the undersigned at (408) 749-6900 ext. 6924. If any additional fees are due in connection with filing this Amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. ADAPP171). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
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